

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA)	
)	Case No. 21-265 (PKC)
v.)	
)	HON. PAMELA K. CHEN
)	
CONGYING ZHENG,)	MOTION FOR MODIFICATION OF
)	BOND AND CONDITIONS OF
Defendant.)	RELEASE

The undersigned PAUL A. GOLDBERGER, ESQ., affirms under penalty of perjury, that:

1. I represent defendant Congying Zheng in the above-captioned case.
2. At present, Mr. Zheng is subject to home confinement with work permission from Pre-trial Services.
3. Your Honor granted Mr. Zheng's Motion back in October of 2021, which allows him to work as a component installer and his working schedule is from Monday to Friday, 9am to 5:30pm.
4. I am writing of behalf of Mr. Zheng requesting to be put on curfew from 9am to 9pm Monday to Sunday.
5. I have conferred regarding this request with AUSA Matthew Haggans and Pre-trial Services (EMUnit), who indicate that they have no objection.

WHEREFORE, the Defendant respectfully moves this Court for an Order modifying the conditions of Mr. Zheng's pre-trial release so that he would be placed on curfew from 9am to 9pm, Monday to Friday at the discretion of the Pre-Trial Services.

Respectfully submitted,

Dated: New York, New York
March 1, 2022

BY: /s/
PAUL A. GOLDBERGER